

SUMMARY OF MAIN FINDINGS FROM ON SITE SURVEY OF KAISER KIDNEY TRANSPLANT PROGRAM

PLAN OVERSIGHT/ADMINISTRATIVE CAPACITY

The Plan (including its Board of Directors) failed to oversee its contracting medical group (the Permanente Medical Group) in the administration of the kidney transplant program. The Plan did not ensure that its contracting medical group had sufficient administrative capacity to transfer enrollees from externally contracted kidney transplant centers into the medical group's kidney transplant program.

- The Plan was not involved in or apparently even aware of the significant planning and other activities that would be required to transfer 1500+ members from the transplant wait lists of external providers, into the new Kaiser renal transplant program.
- The Program was plagued by inadequate staffing, high staff turnover including management, and lack of staff with prior training and experience in administering a renal transplant program.

Corrective actions:

Development of a detailed transition plan which holds the Plan responsible for overseeing successful transition of members into outside programs. The transition plan includes detailed action logs of all steps necessary to transfer patients to UCD and UCSF and weekly meetings with the Department, UCD, UCSF and UNOS which will continue until all patients have been transferred.

The KFH Board of Directors expanded the administrative structure of the renal transplant center by granting the Senior Vice President/Area Manager, who is an officer of the Plan, full legal authority and responsibility for operation of the renal transplant program during the transition. A CEO was appointed, reporting to the Area Manager, who is responsible for the day-to-day management of the program. RTC. Added staff to support the transplant transition plan.

ACCESS AND AVAILABILITY

The Plan did not ensure that its contracting medical group consistently provided timely access to medically required renal specialists and surgeons.

- In the Kaiser program's first full year of operation (2005), only 56 kidney transplants were performed on Kaiser members; by contrast, UCSF performed 136 kidney transplants on Kaiser patients the previous year.

Corrective actions:

The Plan provided a blanket authorization for medically necessary transplants for all members who elect to have their transplants performed at UCD or UCSF. This authorization includes access to covered transplant services for members, and access to

medical specialists connected with such transplants. Members may see the transplant surgeons at UCD and UCSF for covered specialty services associated with their transplants.

CONTINUITY OF CARE

The Plan did not ensure that renal specialty services were provided in a manner providing continuity of care for patients.

- Medical records were incomplete and/or missing for patients being transitioned into the Kaiser program.
- The Program did a very poor job of communicating with the 1500+ members affected by the change about what to expect in the new program and how their wait time on the list would be affected. The Department could not even determine that all of these patients and their providers had been notified that their care was being shifted from UCSF or UCD to Kaiser.
- Extreme confusion in processing and completing wait time transfer forms, authorizing transfer of the patient's wait time into the Kaiser program. Staff stated that there were "innumerable people who over a long period of time (said) I've signed that form four times."

Corrective actions:

The transition plan includes a blanket authorization for referrals to UCD or UCSF, at the member's preference, for medically necessary transplants. Members also continue to receive services from their Plan nephrologists, who will cooperate with UCD and UCSF to coordinate care. The transition plan incorporates the Plan's obligation to provide continuity of care of members for covered transplant services at UCD and UCSF and prompt availability of medical records pursuant to a coordinated transfer of copies of medical records.